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November 17, 2020

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd Chief Clerk and Executive Director Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, SC 29210

Re: South Carolina Energy Freedom Act (House Bill 3659) Proceeding to Address S.C. Code Ann. Section 58-27-460(A)(1) and S.C. Code Ann. Section 58-27-460(A)(2) (Promulgation and Periodic Review of Standards for Interconnection and Parallel Operation of Generating Facilities to an Electrical Utility's Distribution and Transmission System)

Docket No. 2019-326-E

Dear Ms. Boyd:

Attached for filing with the Public Service Commission of South Carolina (the "Commission"), please find the Application of Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP," and together with DEC, "Duke" or the "Companies") for approval of modifications to the to the South Carolina Generator Interconnection Procedures ("SC GIP") to enable the Companies to implement an alternative "Cluster Study" approach to studying and processing generator interconnection requests.

The Companies are pleased to bring this "Queue Reform Proposal" to the Commission, which reflects significant work by Duke and stakeholders over the past 20 months to develop a Cluster Study solution to the challenges of interconnecting new generating facilities, including significant amounts of renewable energy resources, to the Companies' distribution and transmission systems.

Importantly, implementing the Queue Reform Proposal requires complementary and coordinated approvals from the North Carolina Utilities Commission ("NCUC") and the Federal Energy Regulatory Commission ("FERC"). The Companies recently received the necessary approvals from the NCUC¹ and, upon this Commission's approval, will initiate the process to seek regulatory approval from FERC. Accordingly, and as described further in the Application, the Companies request an expedited comment period and review from this Commission to allow the Companies to timely implement the Queue Reform Proposal for the benefit of all South Carolina Interconnection Customers.

¹ Order Approving Queue Reform, N.C.U.C. Docket No. E-100, Sub 101(Oct. 15, 2020).

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> Sincerely, Rebecu Dhi

Rebecca J. Dulin

C: Parties of Record (via email w/ attachments)